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Attorneys for Plaintiff  
FRED I. WAKI, and all others similarly situated

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

FRED I. WAKI, and all others similarly  
situated,

Plaintiff,

vs.

LG PHILIPS LCD COMPANY, LTD,  
et al.,

Civil No. CV 07-00178 (SOM/BMK)

**NOTICE OF MULTIDISTRICT  
CONSOLIDATION PURSUANT 28  
U.S.C. § 1407 AND REQUEST TO  
MAINTAIN STAY; DECLARATION  
OF RYAN W. ROYLO; EXHIBIT "A"  
AND EXHIBIT "B"**

Defendants.

**NOTICE OF MULTIDISTRICT CONSOLIDATION  
PURSUANT 28 U.S.C. § 1407 AND REQUEST TO MAINTAIN STAY**

On April 17, 2007, the Judicial Panel on Multidistrict Litigation (the “JPML”) issued the attached Transfer Order (Exhibit “A”), creating a new multidistrict proceeding entitled *In re: TFT-LCD (Flat Panel) Antitrust Litigation* (the “MDL”), and assigning the MDL to Judge Susan Illston of the Northern District of California.

As required by Rules 1.1, 7.4 and 7.5 of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, this case has been identified to the Panel as a “tag-along” case (*see* attached Exhibit “B,” Notice of Potential Tag-Along Action submitted to the JPML, dated February 20, 2008).

In light of the likely imminent transfer of this case, Plaintiff requests that proceedings be stayed pending transfer to the MDL in order to serve the interests of judicial economy.

Dated Honolulu, Hawaii: February 25, 2008.

/s/ Ryan W. Roylo

RYAN W. ROYLO

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et al.,

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Civil No. CV 07-00178 (SOM/BMK)

EXHIBIT "A" (TRANSFER ORDER)

JUDICIAL PANEL ON  
MULTIDISTRICT LITIGATION

APR 17 2007

**RELEASED FOR PUBLICATION****DOCKET NO. 1827**FILED  
CLERK'S OFFICE**BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION  
IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION****BEFORE WM. TERRELL HODGES, CHAIRMAN, D. LOWELL JENSEN, J.  
FREDERICK MOTZ, ROBERT L. MILLER, JR.,\* KATHRYN H. VRATIL,  
DAVID R. HANSEN AND ANTHONY J. SCIRICA,\* JUDGES OF THE  
PANEL****TRANSFER ORDER**

This litigation currently consists of twenty actions pending in five separate districts: the Northern District of California (thirteen actions), the District of New Jersey (three actions), the Southern District of New York (two actions), the Eastern District of New York (one action) and the Western District of Tennessee (one action). Plaintiffs in eight of the thirteen Northern District of California actions and plaintiff in one of the three District of New Jersey actions separately move the Panel, pursuant to 28 U.S.C. § 1407, for centralization of this litigation in their respective districts.<sup>1</sup> All responding parties support centralization. The majority support selection of the Northern District of California as transferee forum, while others urge the Panel to choose the District of New Jersey, the Southern District of New York, or the Western District of Washington.<sup>2</sup>

On the basis of the papers filed and hearing session held, the Panel finds that these twenty actions involve common questions of fact, and that centralization under Section 1407 in the Northern District of California will serve the convenience of the parties and witnesses and promote the just and efficient conduct of the litigation. All these actions involve common factual allegations concerning defendants' alleged conspiracy to fix the price of thin film transistor-liquid crystal display (TFT-LCD) panels, which are used in computer monitors, flat panel television sets, and other electronic devices. Centralization under Section 1407 is necessary in order to eliminate duplicative discovery, prevent inconsistent pretrial rulings, and conserve the resources of the parties, their counsel and the judiciary.

We conclude that the Northern District of California is an appropriate transferee forum in this docket because over 50 of the actions of which the Panel has been notified have been brought in that

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\* Judge Scirica took no part in the disposition of this matter. In light of the fact that Judge Miller could be a member of the putative class(es) in this litigation, he has filed with the Clerk of the Panel a formal renunciation of any claim that he may have as a putative class member, thereby removing any basis for a disqualification of Judge Miller on that ground.

<sup>1</sup> The Panel has been notified of over 100 additional related actions pending in multiple districts. These actions and any other related actions will be treated as potential tag-along actions. See Rules 7.4 and 7.5, R.P.J.P.M.L., 199 F.R.D. 425, 435-36 (2001).

<sup>2</sup> Certain other responding parties initially suggested that the Panel select either the Eastern District of Tennessee or the District of South Carolina, but withdrew those suggestions at oral argument.

**EXHIBIT A**

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district, and it appears to be somewhat more conveniently located for the significant number of Asia-based defendants.

IT IS THEREFORE ORDERED that, pursuant to 28 U.S.C. § 1407, the actions in this litigation pending outside the Northern District of California and listed on Schedule A are transferred to the Northern District of California and, with the consent of that court, assigned to the Honorable Susan Y. Ilston for coordinated or consolidated pretrial proceedings with the actions pending in that district and listed on Schedule A.

FOR THE PANEL:



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Wm. Terrell Hodges  
Chairman

**SCHEDULE A**MDL-1827 -- In re TFT-LCD (Flat Panel) Antitrust LitigationNorthern District of California

*Judd Eliasoph v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 3:06-7588  
*Jo Nash v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 3:06-7601  
*Will Henderson v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 3:06-7609  
*Jamie Mailes v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 3:06-7638  
*Henry Truong v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 3:06-7639  
*Crago Corp. v. Samsung Electronics Co., Ltd., et al.*, C.A. No. 3:06-7644  
*Robert Kerson v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 3:06-7678  
*Karen Brock v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 3:06-7679  
*Ari Hakim v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 3:06-7699  
*Arthur Sorokin v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 4:06-7600  
*Amy Forlan v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 4:06-7602  
*Stephanie Truong v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 4:06-7640  
*Frederick Roza v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 4:06-7693

District of New Jersey

*Nathan Muchnick, Inc. v. Sharp Corp., et al.*, C.A. No. 2:06-6107  
*Roberta Harrell v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 2:06-6190  
*Richard A. Markham v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 2:06-6191

Eastern District of New York

*Chris Ferencsik v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 1:06-6714

Southern District of New York

*Gladys Baker v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 1:06-14335  
*Jack Elbaz v. LG Philips LCD Co., Ltd., et al.*, C.A. No. 1:06-14423

Western District of Tennessee

*Audio Video Artistry v. Samsung Electronics Co., Ltd., et al.*, C.A. No. 2:06-2848



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EXHIBIT "B" (NOTICE OF  
POTENTIAL TAG-ALONG ACTION)



**BEFORE THE JUDICIAL PANEL  
ON MULTIDISTRICT LITIGATION**

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

MDL No. 1827

This Document Relates to:

ALL CASES.

**NOTICE OF POTENTIAL TAG-  
ALONG ACTION**

**TO: THE JPML AND ALL PARTIES/ATTORNEYS OF RECORD:**

Pursuant to Rule 7.5 of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, Plaintiff hereby provides notice of the following potential Tag-Along action:

United States District Court for the District of Hawai'i

*Fred I. Waki v. LG Philips LCD Company, Ltd.*

Case No. CV07-00178

The Honorable Susan Oki Mollway

This action arises from the same facts and asserts similar claims as the pending actions that are the subject of the above-captioned MDL and should, therefore, be designated as a Tag-Along Action pursuant to Panel Rule 7.5. A true and correct copy of the *Waki* Complaint (which has since been unsealed) is attached hereto as Exhibit A.

Dated: February 19, 2008

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